

# EXHIBIT 34

JON M. SHANE PhD  
8/11/2022

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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HUNTERS CAPITAL, LLC, et al.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 20-cv-00983-TSZ
	)	
CITY OF SEATTLE,	)	
	)	
Defendant.	)	

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Zoom Video Deposition Upon Oral Examination  
Of  
JON M. SHANE, Ph.D.

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DATE: Thursday, August 11, 2022

REPORTED BY: Mindy L. Suurs, CSR 2195

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1 Seattle.

2 Q. So what level of -- strike that.

3 Would it -- in your opinion, should police  
4 officers have risked escalating the potential for violence  
5 on June 11th in order to clear barricades from the spots  
6 where they were on the streets?

7 A. In order to prevent people from coercing official  
8 government operations in the interest of providing adequate  
9 police service and police protection, if police officers  
10 are met with imminent threats or resistance, then the  
11 answer is they can use force to repel those threats, and if  
12 there's a risk that that may happen, it's intrinsic to the  
13 job.

14 Q. So in your opinion, should the police officers  
15 have risked escalating the potential for violence in order  
16 to remove the barricades on the streets on June 11th?

17 A. Again, if you're telling me that the police  
18 officers are doing that in order to prevent the protesters  
19 from coercing official government operations and  
20 threatening police officers and keeping them from providing  
21 adequate police service and police protection to the  
22 general community in and around -- in Seattle, then the  
23 answer is yes. Risk is intrinsic to policing. Risk of  
24 injury and harm is intrinsic to policing.

25 Q. When the police vacated the East Precinct on

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REPORTER'S CERTIFICATE

I, Mindy L. Suurs, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify:

That the foregoing testimony of JON M. SHANE, Ph.D. was given before me at the time and place stated therein and thereafter was transcribed under my direction;

That the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision to the best of my ability;

That the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript;

That the witness, before examination, was by me duly sworn to testify the truth, the whole truth, and nothing but the truth;

That I am not a relative, employee, attorney, or counsel of any party to this action or relative or employee of any such attorney or counsel and that I am not financially interested in the said action or the outcome thereof;

DATE: August 17, 2022

*Mindy L. Suurs*

Mindy L. Suurs  
Certified Court Reporter #2195

